

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

KONINKLIJKE PHILIPS N.V. and PHILIPS ELECTRONICS NORTH AMERICA CORPORATION,)	
)	
)	
)	
Plaintiffs,)	Civil Action No. 2:12-cv-1369
)	
v.)	Judge Nora Barry Fischer
)	
ZOLL LIFECOR CORPORATION,)	ORAL ARGUMENT REQUESTED
)	
Defendant.)	
)	

**DAUBERT MOTION TO EXCLUDE IMPROPER EXPERT TESTIMONY
OF MARK J. CHANDLER**

Philips hereby moves this Court for an order granting its Daubert Motion to Exclude the Improper Expert Testimony of Mark J. Chandler. This Motion is made pursuant to Federal Rules of Evidence 702 and 403. Mr. Chandler's opinions will not aid the trier of fact and are cumulative of the opinions of Zoll's primary damages expert, Dr. Vellturo. The grounds in support of this motion are set forth in detail in Philips's Memorandum in Support of Its Daubert Motion and the declaration of Susan Y. Tull and accompanying exhibits, which are filed herewith.

Dated: November 3, 2016

Respectfully submitted,

/s/ Dara DeCourcy

Robert F. Shaffer

J. Michael Jakes

Susan Y. Tull

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**KONINKLIJKE PHILIPS N.V. and
PHILIPS ELECTRONICS NORTH
AMERICA CORPORATION**

CERTIFICATE OF SERVICE

A copy of the foregoing was electronically filed with the Court on November 3, 2016. Notice of this filing will be sent by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

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